

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

<b>In Re:</b>	)	<b>Case No. 15-42147</b>
	)	<b>Chapter 13</b>
<b>Harding Nosser, Jr.</b>	)	
	)	<b>Motion to Extend</b>
<b>Debtor</b>	)	<b>the Automatic Stay</b>
	)	
	)	
	)	

**MOTION TO EXTEND THE AUTOMATIC STAY**

COMES NOW, the above Debtor and through his attorney and in support of this Motion to Extend the Automatic stay states as follows:

1. Debtor filed the above captioned case in good faith on March 25, 2015.
2. In the preceding twelve (12) months, Debtor filed one previous chapter 13 petition on October 8, 2014, being case # 14-47914 and this case was previously dismissed on the motion of the Trustee for failure to maintain plan payments.
3. Pursuant to 11 USC Section 362 (c)(3)(A) the automatic stay will expire on the 30<sup>th</sup> day after filing the above captioned case.
4. The court may extend the automatic stay for the life of the case pursuant to 11 USC Section 362 (c) (3) (B).
5. Debtor's current case is filed in good faith. Debtor has filed all necessary schedules, and mailed all necessary documents to the Trustee. The Debtor's circumstances are different in this case in that Debtor health and medical issue have much improved since the filing of the previous case allowing Debtor to generate revenue to support the present case. Debtor also believes that an avoidable transfer has occurred in this case which would provide significant recovery to all his creditors.
6. If the automatic stay is not extended, Debtor may lose his house, and business, which is necessary for his plan for an effective reorganization in this chapter.

**WHEREFORE**, Debtor respectfully prays that this court continue the automatic stay in this case to the conclusion of the case, and for any and all further relief which this Court deems just and proper.

Respectfully Submitted,

/s/ Douglas M. Heagler  
Douglas M. Heagler #48952, #115112  
dheagler@freshstartbk.com  
901 Boones Lick  
St. Charles, MO 63301  
PH: 636 278 2778  
FAX 1-866-371-9155

**CERTIFICATE OF SERVICE**

I, the undersigned, do hereby certify that I served a copy of this Notice along with the attached Document(s) upon the parties listed on the service list, by causing the same to be mailed in a properly addressed envelope, postage prepaid, on or before April 22, 2015.

/s/ Douglas M. Heagler  
Douglas M. Heagler #48952  
dheagler@freshstartbk.com  
901 Boones Lick  
St. Charles, MO 63301  
PH: 636 278 2778  
FAX 1-866-371-9155

Office of the United States Trustee  
111 South 10<sup>th</sup> St.  
Ste. 63102  
St. Louis, MO 63102 (Electronic)

John V. Labarge, Jr.  
Chapter 13 Trustee  
P.O. Box 430908  
St. Louis, MO 63143

Harding Nossner, Jr.  
8003 Gravois  
St. Louis, MO 63103

See attached list